MULTIPLE SPECIES CONSERVATION PROGRAM CONFORMANCE STATEMENT
For Renteria Tentative Parcel Map
PDS2007-3200-21107
APN 599-052-01

March 12, 2013

I. Introduction

The Renteria Minor Subdivision would subdivide approximately 59 acres into 4 residential parcels ranging in size from 8 acres to 32 acres net. The project site is located in the community of Jamul, north of Skyline Truck Trail, within unincorporated San Diego County, in the Metro-Lakeside-Jamul Segment of the County of San Diego Multiple Species Conservation Program (MSCP). A portion of the proposed project is located in a Pre-Approved Mitigation Area (PAMA), known as the Otay Mountain/ Jamul Mountain to Sequan Peak linkage and is therefore considered a Biological Resource Core Area (BRCA).

Biological surveys were conducted by Vince Scheidt and disclosed in a report dated January 2013. The project site is currently undeveloped. The following vegetation types occur on the property: southern mixed chaparral, southern coast live oak riparian forest, freshwater seep, non-native grassland, urban/developed and disturbed habitat. The Biological Resources Report also documented the following sensitive wildlife species: Hermes copper butterfly (*Lycaena hermes*), turkey vulture (*Cathartes aura meridionalis*), Cooper's hawk (*Accipiter cooperii*), coastal western whiptail (*Cnemidophorus tigris multiscutatus*), bobcat (*Lynx rufus*) and San Diego horned lizard (*Phrynosoma coronatum blainvillei*). One sensitive plant species was found onsite: San Diego sagewort (*Artemisia palmeri*). A directed habitat evaluation was performed for the Quino checkerspot butterfly (*Euphydryas editha quino*). *Plantago erecta*, Quino's primary host plant was not observed onsite. Although the habitat evaluation results indicate a low potential for Quino checkerspot butterfly to occur onsite because of the lack of host plant and density of chaparral vegetation, Hermes copper butterfly (*Lycaena hermes*) focused surveys were conducted in June and July of 2009 and August of 2010 with positive findings of the species.

The project site contains an unnamed USGS blue-line stream that crosses the property. The stream would be protected within the onsite biological open space easement. Direct impacts from the proposed project include: 19.2 acres of southern mixed chaparral, 0.1 acre of non-native grassland and 0.5 acre of urban/developed lands.

Mitigation for direct impacts to habitat will include the preservation of 28 acres of southern mixed chaparral, 9.6 acres of non-native grassland and 0.28 acre of disturbed habitat within the onsite open space easements. Direct habitat impacts will not result in the depletion of the regional long-term survival of San Diego sagewort, Cooper's hawk, turkey vulture, coastal western whiptail, bobcat and San Diego horned lizard because

the project will mitigate for these species impacts through habitat-based preservation of approximately 38 acres and bird breeding season avoidance.

The project has been designed to cluster the development footprint which avoids and/or minimizes impacts to sensitive species, including Hermes copper to the maximum extent practicable. Extensive surveys and mapping of the species' preferred larval host plant, spiny redberry (*Rhamnus crocea*), and nectar source, California buckwheat (*Eriogonum fasciculatum*) were conducted onsite. Potential Hermes copper habitat was identified and mapped (Figure 2 of the Hermes Copper Survey) where the redberry, buckwheat, and Hermes copper were observed. All onsite areas where Hermes copper butterfly were observed will be protected in the onsite open space. Additional mitigation measures include: dedication of a 100-foot limited building zone, temporary and permanent fences between the proposed open space and residential development, permanent open space signs, grading/clearing avoidance of habitat during migratory bird breeding season.

Table 1. Impacts to Habitat and Required Mitigation

Habitat Type	Tier Level	Existing On-site (ac.)	Proposed Impacts (ac.)	Mitigation Ratio	Required Mitigation	Preserved Onsite
Southern Mixed Chaparral	III	47.2	19.2	1:1	19.2	28.0
Southern Coast Live Oak Riparian Forest	I	0.84	none	none	none	0.84
Freshwater Seep	I	0.59	none	none	none	0.59
Non-Native Grassland	III	9.7	0.10	0.5:1	0.05	9.6
Disturbed Habitat	IV	0.28	none	N/A	none	0.28
Urban/ Developed	IV	0.50	0.50	N/A	none	none
Total:	--	59.1	19.8	--	19.25	39.31

The findings contained within this document are based on County records, staff field site visits and the Biological Resources Survey Report (Vince Scheidt, January 2013). The information contained within these Findings is correct to the best of staff's knowledge at the time the findings were completed. Any subsequent environmental review completed due to changes in the proposed project or changes in circumstance shall need to have new findings completed based on the environmental conditions at that time.

The project has been found to conform to the County's Multiple Species Conservation Program (MSCP) Subarea Plan, the Biological Mitigation Ordinance (BMO) and the Implementation Agreement between the County of San Diego, the CA Department of Fish and Game and the US Fish and Wildlife Service. Third Party Beneficiary Status and the associated take authorization for incidental impacts to sensitive species (pursuant to the County's Section 10 Permit under the Endangered Species Act) shall be conveyed only after the project has been approved by the County, these MSCP Findings are adopted by the hearing body and all MSCP-related conditions placed on the project have been satisfied.

II. Biological Resource Core Area Determination

The impact area and the mitigation site shall be evaluated to determine if either or both sites qualify as a Biological Resource Core Area (BRCA) pursuant to the BMO, Section 86.506(a)(1).

A. Report the factual determination as to whether the proposed Impact Area qualifies as a BRCA. The Impact Area shall refer only to that area within which project-related disturbance is proposed, including any on and/or off-site impacts.

A portion of the project site is located in a Pre-Approved Mitigation Area (PAMA) and therefore, the site qualifies as a BRCA.

B. Report the factual determination as to whether the Mitigation Site qualifies as a BRCA.

As a Biological Resource Core Area, the open space resulting from this project is considered part of the regional MSCP preserve system. As such, all of the requirements relating to the "Preserve" outlined in the County's Subarea Plan, the Implementation Agreement and the Final MSCP Plan apply to this open space.

III. Biological Mitigation Ordinance Findings

A. Project Design Criteria (Section 86.505(a))

The following findings in support of Project Design Criteria, including Attachments G and H (if applicable), must be completed for all projects that propose impacts to Critical Populations of Sensitive Plant Species (Attachment C), Significant Populations of Narrow Endemic Animal Species (Attachment D), Narrow Endemic Plant Species (Attachment E) or Sensitive Plants (San Diego County Rare Plant List) or proposes impacts within a Biological Resource Core Area.

1. Project development shall be sited in areas to minimize impact to habitat.

The proposed pads were sited in the eastern portion of the project site, while the western portion of the site was retained in biological open space. The pads were sited so as to avoid potential Hermes copper butterfly habitat and observation locations and to conserve those high value areas in perpetuity.

2. Clustering to the maximum extent permitted by County regulations shall be considered where necessary as a means of achieving avoidance.

The proposed pads were sited in the eastern portion of the project site so as to retain the onsite portion of the Otay Mountain/ Jamul Mountain to Sequan Peak linkage as well as conserving the avoid potential Hermes copper butterfly habitat and observation locations throughout the site. The pads have been clustered to

the maximum extent practicable in accordance with the County of San Diego Groundwater Ordinance which requires an 8 acre minimum lot size.

3. **Notwithstanding the requirements of the slope encroachment regulations contained within the Resource Protection Ordinance, effective October 10, 1991, projects shall be allowed to utilize design that may encroach into steep slopes to avoid impacts to habitat.**

   RPO steep slope areas occur within the proposed biological open space and limited building zone easements. Encroachments into steep slope areas is not required to avoid impacts to habitat.

4. **The County shall consider reduction in road standards to the maximum extent consistent with public safety considerations.**

   Road reductions are not necessary to minimize impacts for the proposed site design, as the project has been designed to utilize and existing road to access Parcel 1 and has been designed to utilize the shortest possible road to access Parcels 2 through 4 while still retaining safe emergency ingress and egress to the site.

5. **Projects shall be required to comply with applicable design criteria in the County MSCP Subarea Plan, attached hereto as Attachment G (Preserve Design Criteria) and Attachment H (Design Criteria for Linkages and Corridors).**

   A portion of the proposed project is located in a Pre-Approved Mitigation Area (PAMA), known as the Otay Mountain/ Jamul Mountain to Sequan Peak linkage. Accordingly, the proposed open space areas have been designed to provide a large, contiguous area for resource preservation which will also maintain habitat connectivity within the Otay Mountain/ Jamul Mountain to Sequan Peak linkage. Compliance with design criteria is outlined in sections III.B and III.C of this document.

B. Preserve Design Criteria (Attachment G)

In order to ensure the overall goals for the conservation of critical core and linkage areas are met, the findings contained within Attachment G shall be required for all projects located within Pre-Approved Mitigation Areas or areas designated as Preserved as identified on the Subarea Plan Map.

1. **Acknowledge the "no net loss" of wetlands standard that individual projects must meet to satisfy State and Federal wetland goals, policies, and standards, and implement applicable County ordinances with regard to wetland mitigation.**

The project site contains an unnamed USGS blue-line stream that crosses the property. Habitat in this area includes southern coast live oak riparian forest and freshwater seep. The USGS blue-line stream and southern coast live oak riparian forest and freshwater seep habitats are all included in the onsite biological open space and therefore would not be impacted. Therefore, the project meets the "no net loss" of wetlands standard.

2. **Include measures to maximize the habitat structural diversity of conserved habitat areas, including conservation of unique habitats and habitat features.**

   The project will preserve approximately 38 acres of onsite open space. The open space will include southern mixed chaparral, southern coast live oak riparian forest, freshwater seep, non-native grassland, portions of jurisdictional waters and Hermes copper butterfly habitat. The project will maximize habitat structural diversity by preserving four sensitive habitats, a jurisdictional water, a sensitive plant species, and habitat for six County-sensitive wildlife species observed onsite.

3. **Provide for the conservation of spatially representative examples of extensive patches of Coastal sage scrub and other habitat types that were ranked as having high and very high biological value by the MSCP habitat evaluation model.**

   The project site does not contain Coastal sage scrub habitat. The project site is primarily mapped as having low and medium biological value by the MSCP habitat evaluation model. There are small areas of the site that are mapped as having high and very high but these areas are preserved within the onsite biological open space easement.

4. **Create significant blocks of habitat to reduce edge effects and maximize the ratio of surface area to the perimeter of conserved habitats. Subsequently, using criteria set out in Chapter 6, Section 6.2.3 of the MSCP Plan, potential impacts from new development on biological resources within the preserve that should be considered in the design of any project include access, non-native predators, non-native species, illumination, drain water (point source), urban runoff (non-point source) and noise.**

   The onsite open space will connect to undeveloped land to the north and west. There are no edge effects anticipated in these directions. To reduce edge effects from the proposed residential lots created by this project, a 100-foot wide limited building zone easement, temporary fencing (during grading), permanent fencing, and permanent signage will be required adjacent to the open space. The limited building zone easement will prohibit the construction of any habitable structures within 100 feet of the open space easement, therefore precluding the need for future fire-clearing in the Open Space. The project will comply with the

San Diego County Watershed Protection, Storm Water Management, and Discharge Control Ordinance (WPO) and the approved Stormwater Management Plan which will prevent adverse impacts from runoff to the open space.

5. **Provide incentives for development in the least sensitive habitat areas.**

   The project will conserve the most sensitive habitat areas on site, including the jurisdictional wetland, habitat and observation locations of the Hermes copper butterfly and undisturbed habitat within the Otay Mountain/ Jamul Mountain to Sequan Peak linkage. The project proposes development of the eastern portion of the site, which is the least sensitive habitat area.

6. **Minimize impacts to narrow endemic species and avoid impacts to core populations of narrow endemic species.**

   No narrow endemic species have been identified on the project site. Six County-sensitive wildlife were observed on site: Hermes copper butterfly (*Lycaena hermes*), turkey vulture (*Cathartes aura meridionalis*), Cooper's hawk (*Accipiter cooperii*), coastal western whiptail (Cnemidophorus tigris multiscutatus), bobcat (Lynx rufus) and San Diego horned lizard (*Phrynosoma coronatum blainvillei*). Impacts to these species will be minimized by preservation of habitat onsite that will continue to support these species. San Diego sagewort (*Artemisia palmeri*), a County Group D plant species, was the only sensitive plant species identified onsite. This species is considered adequately conserved if appropriate habitat-based mitigation is applied. Habitat mitigation will be a condition of project approval. No other sensitive species have been identified on the project site.

7. **Preserve the biological integrity of linkages between BRCAs.**

   The site is designated as a Pre-Approved Mitigation Area and therefore qualifies as a BRCA. The western portion of the site is within the Otay Mountain/ Jamul Mountain to Sequan Peak linkage and will be conserved in dedicated biological open space. The project will include a 100 foot limited building zone easement adjacent to the onsite open space easement to reduce edge effects. In addition, the project will include permanent fencing and signage along the open space boundary to prevent inadvertent trespass into the open space easement.

8. **Achieve the conservation goals for covered species and habitats (refer to Table 3-5 of the MSCP Plan).**

   The project site supports Cooper's hawk, a covered species under the MSCP Plan. The Cooper's hawk observed onsite was flying overhead. The site supports oak riparian forests, which could be suitable for nesting and foraging habitat for this species. The oak riparian forest onsite would be conserved within the onsite open space easement. Therefore, the project will contribute to

achieving the conservation goals for Cooper's hawk contained in Table 3-5 of the MSCP Plan.

C. Design Criteria for Linkages and Corridors (Attachment H)

For project sites located within a regional linkage and/or that support one or more potential local corridors, the following findings shall be required to protect the biological value of these resources:

1. **Habitat linkages as defined by the BMO, rather than just corridors, will be maintained.**

   The western portion of the project site is located in the Otay Mountain/ Jamul Mountain to Sequan Peak linkage. The proposed project will include approximately 38 acres of open space most of which is within the linkage as it is mapped in the Subarea Plan. The proposed open space generally ranges from 800 to 1000 feet in width where it overlaps with the mapped linkage onsite, although it narrows near the southern boundary of the property. If projects were proposed on adjacent properties to the north and south, additional land offsite would be preserved to further widen the preservation of the linkage.

2. **Existing movement corridors within linkages will be identified and maintained.**

   The proposed project will contribute open space to corridors within the Otay Mountain/ Jamul Mountain to Sequan Peak linkage. It will preserve the main corridor that connects lands within the Otay Mountain/ Marron Valley and McGinty Mountain/ Sycuan Peak-Dehesa core resource areas. The project does not propose barriers that would prevent or impact wildlife from using the identified linkage.

3. **Corridors with good vegetative and/or topographic cover will be protected.**

   The proposed open space will preserve southern mixed chaparral, southern coast live oak riparian forest, freshwater seep and non-native grassland. The project site is undeveloped and supports vegetation and topography that would encourage wildlife movement. The project will conserve approximately 38 acres which will contribute to continued wildlife movement within the Otay Mountain/ Jamul Mountain to Sequan Peak linkage.

4. **Regional linkages that accommodate travel for a wide range of wildlife species, especially those linkages that support resident populations of wildlife, will be selected.**

   The preservation of open space on this property will contribute to the existing regional linkage identified in the western portion of the project site. The onsite

open space will allow for the continued travel for a wide range of resident wildlife populations.

5. **The width of a linkage will be based on the biological information for the target species, the quality of the habitat within and adjacent to the corridor, topography, and adjacent land uses. Where there is limited topographic relief, the corridor must be well vegetated and adequately buffered from adjacent development.**

   The site is part of the Otay Mountain/ Jamul Mountain to Sequan Peak linkage. After development of the eastern portion of the site, the linkage will be over 1,000 feet wide in the project vicinity. The land contains a diversity of habitats and includes a natural drainage and mature vegetation. The project design includes a 100-foot limited building zone easement to prevent edge effects from the proposed development development.

6. **If a corridor is relatively long, it must be wide enough for animals to hide in during the day. Generally, wide linkages are better than narrow ones. If narrow corridors are unavoidable, they should be relatively short. If the minimum width of a corridor is 400 feet, it should be no longer than 500 feet. A width of greater than 1,000 feet is recommended for large mammals and birds. Corridors for bobcats, deer, and other large animals should reach rim-to-rim along drainages, especially if the topography is steep.**

   The linkage will maintain a width of approximately 1,000 feet through the project site and the project's open space will contribute to this width. The site supports mostly small resident species but also has evidence of larger mammal use, including coyotes and bobcats. The proposed residential development will occur in the eastern portion of the site, while the western and southern portions of the site will be included in biological open space. The open space will preserve a natural drainage and will continue to provide hiding places and movement opportunities for large mammals, reptiles and birds.

7. **Visual continuity (i.e., long lines-of-site) will be provided within movement corridors. This makes it more likely that animals will keep moving through it. Developments along the rim of a canyon used as a corridor should be set back from the canyon rim and screened to minimize their visual impact.**

   The site and local area contains significant topography that limits visual continuity. The vegetated slopes and natural drainages to be preserved onsite will provide cover and screening for wildlife within the Otay Mountain/ Jamul Mountain to Sequan Peak linkage. By locating the proposed development in the eastern portion of the site, the existing visual continuity along the eastern portion of the site and within the Otay Mountain/ Jamul Mountain to Sequan Peak linkage will be maintained.

8. **Corridors with low levels of human disturbance, especially at night, will be selected. This includes maintaining low noise levels and limiting artificial lighting.**

   The project does not include street lighting and only minimal residential lighting is expected to occur. Exterior lighting will likely be located on or immediately around the single-family residences. The project will include a 100-foot wide limited building zone which will provide further separation between the linkage and the housing pads. In addition, no significant sources of noise are associated with the project and the traffic volumes are expected to be low due to the low density nature of the project. Finally, the project will include open space fences and signage to keep human disturbance to a minimum and prevent inadvertent trespass into the open space easements.

9. **Barriers, such as roads, will be minimized. Roads that cross corridors should have ten foot high fencing that channels wildlife to underpasses located away from interchanges. The length-to-width ratio for wildlife underpasses is less than 2, although this restriction can be relaxed for underpasses with a height of greater than 30 feet.**

   One driveway will utilize an existing disturbed road to access Parcel 1. This driveway crosses the open space easement and portion of the Otay Mountain/ Jamul Mountain to Sequan Peak linkage which occurs onsite. Fencing to channel wildlife is not necessary in this case since the road is existing and will have very low traffic volumes as it will serve only one residence.

10. **Where possible at wildlife crossings, road bridges for vehicular traffic rather than tunnels for wildlife use will be employed. Box culverts will only be used when they can achieve the wildlife crossing/movement goals for a specific location. Crossings will be designed as follows: sound insulation materials will be provided; the substrate will be left in a natural condition, and vegetated with native vegetation if possible; a line-of-site to the other end will be provided; and if necessary, low-level illumination will be installed in the tunnel.**

    One driveway will utilize an existing disturbed road to access Parcel 1. This driveway crosses the open space easement and portion of the Otay Mountain/ Jamul Mountain to Sequan Peak linkage which occurs onsite. The road is existing and will have very low traffic volumes as it will serve only one residence. Therefore, bridging and/or box culverts are not necessary.

11. **If continuous corridors do not exist, archipelago (or stepping-stone) corridors may be used for short distances. For example, the gnatcatcher may use disjunct patches of sage scrub for dispersal if the distance involved is less than 1-2 miles.**

Southern mixed chaparral, non-native grassland, freshwater seep and southern coast live oak riparian forest will be preserved in the western portion of the site. These habitats are within the Otay Mountain/ Jamul Mountain to Sequan Peak linkage as identified by the MSCP Subarea Plan and will contribute to continue wildlife movement in the area. Therefore, the project will preserve a continuous corridor for wildlife movement.

IV. Subarea Plan Findings

Conformance with the objectives of the County Subarea Plan is demonstrated by the following findings:

1. **The project will not conflict with the no-net-loss-of-wetlands standard in satisfying State and Federal wetland goals and policies.**

   The project site contains an unnamed USGS blue-line stream that crosses the property. Habitat in this area includes southern coast live oak riparian forest and freshwater seep. The USGS blue-line stream and southern coast live oak riparian forest and freshwater seep habitats are all included in the onsite biological open space and therefore would not be impacted. Therefore, the project meets the "no net loss" of wetlands standard.

2. **The project includes measures to maximize the habitat structural diversity of conserved habitat areas including conservation of unique habitats and habitat features.**

   The project will preserve approximately 38 acres of onsite open space. The open space will include southern mixed chaparral, southern coast live oak riparian forest, freshwater seep, non-native grassland, portions of jurisdictional waters and Hermes copper butterfly habitat. The project will maximize habitat structural diversity by preserving four sensitive habitats, a jurisdictional water, a sensitive plant species, and habitat for six County-sensitive wildlife species observed onsite.

3. **The project provides for conservation of spatially representative examples of extensive patches of Coastal sage scrub and other habitat types that were ranked as having high and very high biological values by the MSCP habitat evaluation model.**

   The project site does not contain Coastal sage scrub habitat. The project site is primarily mapped as having low and medium biological value by the MSCP habitat evaluation model. There are small areas of the site that are mapped as having high and very high but these areas are preserved within the onsite biological open space easement.

4. **The project provides for the creation of significant blocks of habitat to reduce edge effects and maximize the ratio of surface area to the perimeter of conserved habitats.**

The onsite open space will connect to undeveloped land to the north and west. There are no edge effects anticipated in these directions. To reduce edge effects from the proposed residential lots created by this project, a 100-foot wide limited building zone easement, temporary fencing (during grading), permanent fencing, and permanent signage will be required adjacent to the open space. The limited building zone easement will prohibit the construction of any habitable structures within 100 feet of the open space easement, therefore precluding the need for future fire-clearing in the Open Space. The project will comply with the San Diego County Watershed Protection, Storm Water Management, and Discharge Control Ordinance (WPO) and the approved Stormwater Management Plan which will prevent adverse impacts from runoff to the open space.

5. **The project provides for the development of the least sensitive habitat areas.**

   The project will conserve the most sensitive habitat areas on site, including the jurisdictional wetland, habitat and observation locations of the Hermes copper butterfly and undisturbed habitat within the Otay Mountain/ Jamul Mountain to Sequan Peak linkage. The project proposes development of the eastern portion of the site, which is the least sensitive habitat area.

6. **The project provides for the conservation of key regional populations of covered species, and representations of sensitive habitats and their geographic sub-associations in biologically functioning units.**

   Six County-sensitive wildlife were observed on site: Hermes copper butterfly (*Lycaena hermes*), turkey vulture (*Cathartes aura meridionalis*), Cooper's hawk (*Accipiter cooperii*), coastal western whiptail (Cnemidophorus tigris multiscutatus), bobcat (Lynx rufus) and San Diego horned lizard (*Phrynosoma coronatum blainvillei*). Impacts to these species will be minimized by preservation of habitat onsite that will continue to support these species. San Diego sagewort (*Artemisia palmeri*), a County Group D plant species, was the only sensitive plant species identified onsite. This species is considered adequately conserved if appropriate habitat-based mitigation is applied. Habitat mitigation will be a condition of project approval. No other sensitive species have been identified on the project site.

7. **Conserves large interconnecting blocks of habitat that contribute to the preservation of wide-ranging species such as Mule deer, Golden eagle, and predators as appropriate. Special emphasis will be placed on conserving adequate foraging habitat near Golden eagle nest sites.**

   The onsite open space easements create a large area of habitat that is contiguous with offsite habitat located within the Otay Mountain/ Jamul Mountain to Sequan Peak linkage. The onsite preservation is expected to contribute to the long-term survival and movement of many species. The site is not located near Golden eagle nest sites; however, it does provide preserved potential habitat for mule deer, small mammals, raptors, and local predators.

8. **All projects within the San Diego County Subarea Plan shall conserve identified critical populations and narrow endemics to the levels specified in the Subarea Plan. These levels are generally no impact to the critical populations and no more than 20 percent loss of narrow endemics and specified rare and endangered plants.**

   No narrow endemic species have been identified on the project site. Six County-sensitive wildlife were observed on site: Hermes copper butterfly (*Lycaena hermes*), turkey vulture (*Cathartes aura meridionalis*), Cooper's hawk (*Accipiter cooperii*), coastal western whiptail (Cnemidophorus tigris multiscutatus), bobcat (Lynx rufus) and San Diego horned lizard (*Phrynosoma coronatum blainvillei*). Impacts to these species will be minimized by preservation of habitat onsite that will continue to support these species. San Diego sagewort (*Artemisia palmeri*), a County Group D plant species, was the only sensitive plant species identified onsite. This species is considered adequately conserved if appropriate habitat-based mitigation is applied. Habitat mitigation will be a condition of project approval. No other sensitive species have been identified on the project site.

9. **No project shall be approved which will jeopardize the possible or probable assembly of a preserve system within the Subarea Plan.**

   The project includes a design that will protect the regional preserve system as designed in the Subarea Plan. The site is located within the Otay Mountain/ Jamul Mountain to Sequan Peak linkage. The project has been designed to preserve the western portion of the project site including the linkage. Therefore, the project will not jeopardize the possible or probable assembly of a preserve system within the Subarea Plan.

10. **All projects that propose to count on-site preservation toward their mitigation responsibility must include provisions to reduce edge effects.**

    The open space has been designed to reduce edge effects by limiting development to one main area. Potential edge effects to the adjacent Crestridge Reserve have also been minimized with the inclusion of a 100-foot biological buffer on the western side of the property. The project will also include permanent fencing and signs that will be placed around the residential development to prevent inadvertent trespass into the open space easements.

11. **Every effort has been made to avoid impacts to BRCAs, to sensitive resources, and to specific sensitive species as defined in the BMO.**

    The project proposes impacts to BRCA habitat lands. The impacts to the BRCA lands are reduced to an approximately 20 acre development footprint that will include residential pads, private roads and driveways, fuel management, and septic. The development footprint location was designed in the eastern portion of the project site to avoid impacts to the onsite linkage. All areas located outside of the development footprint will be in a biological open space easement totaling

approximately 38 acres located in a large-block of habitat that is adjacent to offsite undeveloped lands. Sensitive resources that were observed on the property will be avoided and/or mitigated through a habitat-based onsite, the dedication of a 100-foot limited building zone, temporary and permanent fences between the proposed open space and residential development, permanent open space signs, biological monitoring during grading/clearing, grading/clearing avoidance of habitat during migratory bird and raptor breeding season.

Ashley Gungle, Planning & Development Services

March 12, 2013

MSCP Designation For
Renteria Tentative Parcel Map
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